UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS (BOSTON)

In Re: BIOGEN IDEC, INC.,
SECURITIES LITIGATION

x 1:05-cv-10400 (RCL)
x

JOINT MOTION FOR ENTRY OF SCHEDULING ORDER

Pursuant to the Court's request at the September 23, 2005 hearing, the Lead Plaintiff Biogen Institutional Investor Group and Defendants Biogen Idec, Inc., William Rastetter, and James Mullen have conferred concerning a proposed schedule for this litigation. The Defendants have expressed their intention to file a Motion to Dismiss the Lead Plaintiffs' Consolidated Amended Complaint. The Private Securities Litigation Reform Act ("PSLRA") provides:

In any private action arising under this chapter, all discovery and other proceedings shall be stayed during the pendency of any motion to dismiss, unless the court finds upon the motion of any party that particularized discovery is necessary to preserve evidence or to prevent undue prejudice to that party.

15 U.S.C. §78u-4(b)(3)(B)

In light of the PSLRA discovery stay, the parties are at this time submitting a proposed schedule only for the filing of the Consolidated Amended Complaint, the Defendants' Motion to Dismiss and the briefing schedule related to that Motion.

WHEREFORE, the parties move this Court to enter the following schedule:

Consolidated Amended Complaint—to be filed 45 days from entry
of an order resolving the pending objection to the Order of Magistrate Bowler appointing
Biogen Institutional Investor Group as Lead Plaintiff;

2. Motion to Dismiss—to be filed 45 days after service of the

Consolidated Amended Complaint;

3. <u>Lead Plaintiff's Opposition to the Motion to Dismiss</u>—to be filed

45 days after service of the Motion to Dismiss; and

4. Defendants' Reply—to be filed 21 days after service of Lead

Plaintiff's Opposition.

Dated: November 9, 2005 Respectfully submitted:

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Counsel for Defendants

SO ORDERED.

Reginald C. Lindsay
United States District Judge